

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

## Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket Nos. 788 & 839**

**CERTIFICATION OF  
COUNSEL REGARDING NINTH NOTICE OF REJECTION OF  
CERTAIN EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 30, 2025, the Debtors filed the *Ninth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 788] (the “Rejection Notice”), noticing the rejection of certain contracts. Attached as Schedule 3 to the Rejection Notice was a proposed contract rejection order (the “Proposed Order”).

2. As set forth in the Rejection Notice, the deadline to object to the proposed rejection of any of the contracts listed in the Proposed Order was May 14, 2025 (the “Objection Deadline”).

3. Prior to the Objection Deadline, Marple XYZ Associates, L.P. (“Marple”) filed the *Limited Objection and Reservation of Rights of Marple XYZ Associates, L.P. to the Proposed*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

*Rejection of the Unexpired Lease at 400 S. State Rd, Springfield, PA 19064 and the Abandonment of Property* [Docket No. 839] (the “Marple Objection”).

4. The undersigned certifies that the Objection Deadline has passed, and the Court’s docket has been reviewed in these cases, and no other answer, objection, or other responsive pleading to the Rejection Notice appears thereon.

5. The Debtors have revised the Proposed Order to remove Marple’s lease from the Proposed Order pending further discussions with Marple’s counsel. A Revised Proposed Order (the “Revised Proposed Order”) is attached hereto as **Exhibit A**.

6. A redline comparing the list of contracts subject to the Revised Proposed Order and Proposed Order is attached hereto as **Exhibit B**.

7. The Debtors respectfully request that the Court enter the Revised Proposed Order, attached hereto as **Exhibit A**, at its earliest convenience.

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Dated: May 21, 2025  
Wilmington, Delaware

*/s/ Jack M. Dougherty*

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**Exhibit A**

**Revised Proposed Order**

**Exhibit B**

**Redline**